

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JOSE ENRIQUE DELGADO MONTES
LUZ ZENAIDA DELGADO LOPEZ

Debtors

BANCO POPULAR of PUERTO RICO

Movant

JOSE ENRIQUE DELGADO MONTES
LUZ ZENAIDA DELGADO LOPEZ
And NOREEN WISCOVITCH RENTAS
As CHAPTER 7 TRUSTEE
Respondents

CASE NO. 16-08525/ESL

CHAPTER 7

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**DEBTORS' RESPONSE TO MOTION FOR RELIEF OF AUTOMATIC STAY UNDER
11 USC SECTION 362, DOCKET #10**

TO THE HONORABLE COURT:

NOW COME, JOSE ENRIQUE DELGADO MONTES and LUZ ZENAIDA DELGADO LOPEZ, debtors, through the undersigned attorney, and very respectfully state and pray as follows:

1. On November 10, 2016, Banco Popular de Puerto Rico ("BPPR") filed a motion for relief from the automatic stay in the present bankruptcy case, docket #10, basically alleging that the debtors are in pre-petition arrears in the direct mortgage loan payments to said creditor.

2. The debtors respectfully submit that they are hereby consenting to the lift of stay in favor of BPPR to allow this secured creditor to foreclose on its collateral, *IN REM* action.

3. It is to be noted that the debtor filed a *Statement of Intention for Individuals Filing Under Chapter 7*, docket #1, whereby the debtors notified their intention to surrender the real property

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which serves as collateral to BPPR's secured claim.

WHEREFORE, debtors respectfully request from this Honorable Court to grant the present motion consenting to BPPR's request for the lift of stay in the above captioned Index.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system, which will send notification of same to: the Chapter 7 Trustee, Noreen Wiscovitch Rentas Esq.; Juan C. Fortuño Fas, Esq., Counsel for BPPR; I also certify that a copy of this motion was sent via regular mail to the debtors/respondents, Jose Enrique Delgado Montes and Luz Zenaida Delgado Lopez to their address in record: Urb. Santa Clara 25 Calle 1 San Lorenzo, PR 00754.

RESPECTFULLY SUBMITTED, In San Juan, Puerto Rico, this 17th day of November, 2016.

/s/ Roberto A. Figueroa Colón
ROBERTO A. FIGUEROA COLON
USDC #300105
FIGUEROA & SERRANO, PSC
PO BOX 1635
GUAYNABO PR 00970-1635
TEL NO. (787) 744-7699
EMAIL: rfigueroa@fslawpr.com